

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SYNOPSYS, INC.,
a Delaware corporation,

Plaintiff and
Counter-Defendant,

v.

MAGMA DESIGN AUTOMATION, INC.,
a Delaware corporation,

Defendant and
Counter-Claimant.

C.A. No. 05-701-GMS

**MAGMA DESIGN AUTOMATION, INC.’S NOTICE OF DEPOSITION
PURSUANT TO FED. R. CIV. P.30(B)(6) TO SYNOPSYS, INC.**

NOTICE IS HEREBY GIVEN pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure that defendant and counterclaimant Magma Design Automation, Inc. (“Magma”) will take the deposition of Synopsys, Inc. (“Synopsys”) on Wednesday, July 31, 2006, upon oral examination to be recorded by audio, video and stenographic means.

The deposition will be conducted in the offices of Pooley & Oliver at 3000 El Camino Real, Building 5, 7th floor, Palo Alto, CA. 94306, before a notary public or other officer authorized by law to administer oaths. The deposition will begin at 9:30 a.m. and continue from day to day until completed.

Pursuant to Fed. R. Civ. P. 30(b)(6), Synopsys is required to designate one or more officers, directors, agents, or other persons to testify on its behalf as to the matters set forth in Attachment A.

On or before July 24, 2006, Synopsys is requested to provide Magma’s counsel written notice of the name(s) and position(s) of the individuals who will be produced to testify on the topics set forth in Attachment A, including the topics on which he or she will testify.

Dated: July 21, 2006

FISH & RICHARDSON P.C.

By: /s/ William J. Marsden, Jr.

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Attorneys for Defendant and Counter-Claimant
MAGMA DESIGN AUTOMATION, INC.

DEFINITIONS

A. As used herein, “Synopsys” means Synopsys, Inc., and all predecessors, successors, partnerships and affiliates thereof, all foreign subsidiaries thereof, and all members, managers, agents, employees, attorneys and other persons acting on its behalf.

B. As used herein, “Magma” means Magma Design Automation, Inc., and all predecessors, successors, partnerships and affiliates thereof, all foreign subsidiaries thereof, and all members, managers, agents, employees, attorneys and other persons acting on its behalf.

C. As used herein, “Source Code” means the source code underlying Synopsys’s Galaxy Design Platform.

D. As used herein, “Galaxy Design Platform” means the products as identified and explained in http://www.synopsys.com/products/solutions/galaxy_platform.html.

E. “And” and “or” shall each be construed conjunctively or disjunctively, whichever makes the request more inclusive.

F. “Any” and “all” shall each be construed to mean “each and every,” so as to acquire the broadest meaning possible.

G. The singular form of a word should be interpreted in the plural as well.

H. Any pronoun shall be construed to refer to the masculine, feminine, or neuter gender as in each case is most inclusive.

I. The term “and/or” should be construed in the way that makes the request at issue most inclusive.

ATTACHMENT A
SUBJECTS OF TESTIMONY

1. Design and architecture of the Source Code, including but not limited to the design and architecture of the Source Code internals.
2. How the design, architecture, and functionality of the Source Code is documented or recorded.
3. Storage of the Source Code, including but not limited to any source control system used by Synopsys.
4. Maintenance of the Source Code.
5. The process by which Synopsys records comments and commentary for its Source Code, including but not limited to file comments, section comments, line comments, and function comments.
6. The process by which Synopsys documents its Source Code such that a reasonably trained engineer could understand and maintain the Source Code.
7. How Synopsys records the development of the Source Code, including but not limited to functional specification documents, requirements documents, and architecture documents, as well as how and where such documents are stored.

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2006, I electronically filed with the Clerk of Court **MAGMA DESIGN AUTOMATION, INC.'S NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P.30(b)(6) TO SYNOPSYS, INC.** using CM/ECF which will send electronic notification of such filing(s) to the below-listed Delaware counsel. In addition, the filing will also be sent via U.S. First Class Mail and facsimile to:

Karen Jacobs Loudon, Esquire
Morris, Nichols, Arsht & Tunnell
1201 North Market Street
Wilmington, DE 19801
Fax: (302) 658-3989

Attorneys for Plaintiff
Synopsys, Inc.

I hereby certify that on July 21, 2006, I have sent the document(s) by U.S. First Class Mail and facsimile to the following non-registered participants:

Valerie M. Wagner, Esquire
Dechert LLP
1117 California Avenue
Palo Alto, CA 94304
Fax: (650) 813-4848

Attorneys for Plaintiff
Synopsys, Inc.

/s/ William J. Marsden, Jr.

William J. Marsden, Jr.